

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

**MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2012**

DOCKET No. N2012-1

**UNITED STATES POSTAL SERVICE NOTICE OF FILING ERRATA TO
RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI TO
GREETING CARD ASSOCIATION INTERROGATORIES
(GCA/USPS-T4-17(a-b))
(March 21, 2012)**

The Postal Service today files errata to the Response of United States Postal Service Witness Neri to Greeting Card Association Interrogatory GCA/USPS-T4-17(a-b), which was filed on March 2, 2012. The response contained errors, which have been corrected in the attachment to this filing. The corrections are shown in gray highlighted text.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
By its attorneys:

Anthony F. Alverno
Chief Counsel
Global Business and Service Development

James M. Mecone

475 L'Enfant Plaza, S.W.
Washington, D.C. 20260
(202) 268-6525; Fax -5287
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RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO GREETING CARD ASSOCIATION INTERROGATORIES

GCA/USPS-T4-17

In your response to GCA/USPS-T4-1, the question referenced "declining volume in First Class Mail", and your answer to part (a) was that "up until 2006, volumes were growing."

(a) For each of (i) through (iv), below, please state the year in which the category of mail peaked:

(i) Total First-Class Mail;

(ii) Total First-Class Letter Mail;

(iii) Single-Piece First-Class Letter Mail;

(iv) Workshared First-Class Letter Mail.

(b) For each of (a)(i) through (a)(iv), please state the source of the data on which you rely to identify the peak year.

(e) Please refer to your answer in GCA/USPS-T4-1(a), referring to the use of excess capacity to "accommodate the volume growth." Was the volume growth that you refer to growth in worksharing First-Class Letter Mail alone? If your answer is not an unqualified "yes," please explain fully.

(f) If your answer to (e) was affirmative in any degree, please explain (i) whether the Postal Service was adding further capacity, up to 2006-2007, when worksharing activity for all upstream processing was increasing (presumptively displacing the Postal Service's need to add capacity), and (ii) if so, why.

(g) If your answer to (e) was negative, please state what other categories of First-Class Mail besides workshared were growing in volume until 2006-2007.

RESPONSE:

(a) (i) FY 2001 (103.7 billion pieces)

(ii) FY 2001 (98.2 billion pieces).

(iii) FY 1990 (56.8 billion pieces).

(iv) FY 2007 (50 billion pieces).

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS NERI
TO GREETING CARD ASSOCIATION INTERROGATORIES
RESPONSE to GCA/USPS-T4-17 (continued):

(b) Please see the annual Revenue Pieces & Weight Reports filed by the Postal Service, the Annual Compliance Reports filed by the Postal Service at the Commission beginning with PRC Docket No. ACR2007-1, and the Domestic Mail Volume History/1970-2010.

(e-g) No. The primary driver of mail processing capacity is the amount of mail processing equipment required to process Delivery Point Sequencing of letter mail within the operating window driven by the overnight service standard. Single piece and commercial (workshared) First-Class and Standard letter mail is sorted by the Postal Service into Delivery Point Sequence in mail processing facilities.